



The State of Alaska

Public Defender Agency

Samantha Cherot, Public Defender

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Ms. Meredith Montgomery
Clerk of the Appellate Courts
303 K Street
Anchorage, AK 99501-2084

Served via email

Re: *Fryberger v. State*, A-13443: **Notice of Supplemental Authority**

Dear Ms. Montgomery:

Pursuant to Appellate Rule 212(c)(12), this letter serves as notice of supplemental authority to the briefing filed in this case.

The supplemental authority is

- 1) *Bluel v State*, **153 P.3d 982** (Alaska 2007), and it is relevant to the argument at pages 32-35 and 42-48 of the appellant's opening brief.
- 2) *Clifton v. State*, 751 P.2d 27 (Alaska 1988), and it is relevant to the argument at 47-48 of the appellant's opening brief.
- 3) *Nighswonger v. State*, 662 P.2d 445 (Alaska App. 1983), and it is relevant to the argument at 42-48 of the appellant's opening brief.

Sincerely,

A handwritten signature in blue ink, appearing to read "Emily Jura", is written over a light blue rectangular background.

Emily Jura
Assistant Public Defender

/RMM

cc: Ken Rosenstein, Office of Criminal Appeals (by email)